

Exhibit “A”

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

FILE COPY

PAUL T. PAPADAKIS,
Plaintiff,

v.

CSX TRANSPORTATION, INC.,
Defendant.

C.A. No.: 04-30189-MAP

DEFENDANT'S DISCLOSURE OF EXPERT WITNESS
EDWARD FELDMANN, M.D., PURSUANT TO FED.R.CIV.P. 26(a)(2)
AND LOCAL RULE 26.4(A)

The defendant, CSX Transportation, Inc. ("CSX"), hereby submit the following Disclosure of expert witness Edward Feldmann, M.D., Neurologist, pursuant to Fed.R.Civ.P. 26(a)(2) and Local Rule 26.4(A). Dr. Feldmann's *Curriculum Vitae*, List of Prior Cases in which Dr. Feldmann has testified or been deposed, a List of Publications, are attached hereto, and incorporated by reference. Dr. Feldmann is being compensated for his record review and *Independent Medical Examination* ("IME") at a rate of \$300 per hour, and will be compensated for his testimony at a rate of \$400 per hour plus expenses.

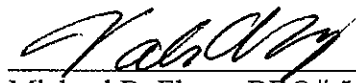
Dr. Feldmann is a neurologist. He is expected to testify about the plaintiff's alleged injuries, his medical care and treatment and the extent of any disability the plaintiff has endured. Dr. Feldmann is expected to testify that Mr. Papadakis suffered nothing more than a soft-tissue injury, without any disc involvement, as a result of his alleged accident. This should have resolved in between 2 – 12 weeks. The "torn disc" which is described in the records is related solely to degenerative changes and was not caused in any way, shape or form by the accident. In addition, he will testify that the MRI's show that Mr. Papadakis' condition has actually been

improving over time.

Dr. Feldmann's opinions will be based on his education, training and experience as a neurologist, all of which is more fully set forth in his *Curriculum Vitae*. Dr. Feldmann's opinions may also be based on his review of the following: the plaintiff's deposition, the report of Leona Liberty, the plaintiff's medical records and the examination of the plaintiff, which has not yet been conducted. Dr. Feldmann will prepare his report after he has conducted an IME of the plaintiff, which has been agreed to by plaintiff's counsel and is presently the subject of a pending motion.

The defendant reserves the right to supplement/amend this *Disclosure* prior to trial.

Respectfully submitted,
CSX TRANSPORTATION, INC.,
By their attorneys,


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Dated: October 18, 2005

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